



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TM:AES
F. #2013R01609

271 Cadman Plaza East
Brooklyn, New York 11201

October 2, 2013

By Federal Express and ECF

Martin G. Goldberg
672 Dogwood Avenue #183
Franklin Square, NY 11010

Re: United States v. Paul Rivera
Criminal Docket No. 13-149 (S-1) (KAM)

Dear Mr. Goldberg:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter additional discovery in the above-referenced matter. This letter is intended to supplement the government's discovery letters dated April 2, 2013, May 17, 2013, and August 20, 2013. Please consider this letter to be the government's renewed request for reciprocal discovery.

On the enclosed CD marked TF MAFIA CD-2, please find copies of the following:

- Tax records for the defendant, pertaining to tax years 2006 through 2011, which are Bates numbered TFMAFIA 131-180. (Please note that these documents were previously produced in an unredacted form as RIVERA 813-862).
- Tax records for co-defendant Michael Garrett pertaining to tax years 2009 through 2012, which are Bates numbered TFMAFIA 181-206.
- Tax records for TF Mafia Muzik LLC pertaining to tax years 2008 to 2011, which are Bates numbered TFMAFIA 207-273.
- Records from ADP Small Business Services for TF Mafia Muzik LLC, which are Bates numbered TFMAFIA 274-447.

- Records from JP Morgan Chase Bank for TF Mafia Muzik LLC, which are Bates numbered TFMAFIA 448-1930.
- Records from JP Morgan Chase Bank for the defendant, which are Bates numbered TFMAFIA 1931-2477.
- A statement of the defendant, which is Bates numbered TFMAFIA 2478.
- Records from the MDC pertaining to the defendant, which include (1) call logs for phone calls made by the defendant between May 15, 2013 and August 19, 2013, (2) inmate contacts for the defendant, (3) an inmate center report for the defendant, and (4) an inmate quarters history for the defendant, which have been Bates numbered TFMAFIA 2479-2497.
- Records from the MDC pertaining to co-defendant Michael Garrett, which include (1) call logs for phone calls made by Garrett between June 16, 2013 and August 19, 2013, (2) inmate contacts for Garrett, (3) an inmate center report for Garrett, and (4) an inmate quarters history for Garrett, which have been Bates numbered TFMAFIA 2498-2511.

In addition, enclosed please find a CD titled TF MAFIA CD-3, which contains recorded phone calls made by the defendant at the MDC between May 15, 2013 and August 19, 2013 (and which correspond to the call logs produced as TFMAFIA 2479-2481), and a CD titled TF MAFIA CD-4, which contains recorded phone calls made by co-defendant Michael Garrett at the MDC between June 16, 2013 and August 19, 2013 (and which correspond to the call logs produced as TFMAFIA 2498-2501).

If you have any questions about these materials, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Taryn Merkl
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Alixandra E. Smith
Assistant U.S. Attorneys
718-254-6064/6370

Enclosures (TF MAFIA CD-2, TF MAFIA CD-3, TF MAFIA CD-4)

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)